

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	
	§	
ATP OIL & GAS CORPORATION	§	CASE NO. 12-36187
	§	CHAPTER 11
Debtor.	§	

**ATP OIL & GAS CORPORATION'S STATUS REPORT WITH RESPECT TO THE  
PROPOSED SCHEDULE FOR THE FILING OF DISCLOSURE  
STATEMENT AND CHAPTER 11 PLAN**

TO: THE HONORABLE MARVIN ISGUR,  
UNITED STATES BANKRUPTCY JUDGE

ATP Oil & Gas Corporation ("**ATP**"), hereby files *ATP Oil & Gas Corporation's Status Report with Respect to the Proposed Schedule for the Filing of Disclosure Statement and Chapter 11 Plan* (the "**Status Report**"), and in support thereof, would respectfully submit as follows:

**I. INTRODUCTION**

1. On October 8, 2012, the Court entered an order setting a hearing (the "**Hearing**") to consider *Roman Gelsi's Motion to Convert* (the "**Motion to Convert**") on October 17, 2013. [Docket Nos. 2213 and 2653]. At the Hearing, counsel for ATP announced an agreement to continue the Hearing on the Motion to Convert. The Court agreed to continue the Hearing until October 31, 2013. However, the Court conditioned the continuance on ATP providing a time schedule as to when a chapter 11 plan will be filed. In order to comply with the Court's instructions, ATP has prepared the Status Report.

## **II. PROPOSED SCHEDULE**

### **A. *PROPOSED SCHEDULE FOR THE FILING OF DISCLOSURE STATEMENT AND PLAN***

2. After due consideration and consultation with key third parties with respect to various timing issues, ATP would propose the following timeline for the Court's consideration:

- December 12, 2013 - Status Conference to be held in order to update Court as to the status of chapter 11 plan; and
- January 15, 2015 – Deadline by which ATP shall file proposed disclosure statement and chapter 11 plan (the “**Filing Deadline**”).

### **B. *THE PROPOSED SCHEDULE IS REASONABLE UNDER THE CURRENT CIRCUMSTANCES***

3. ATP has been in discussions with multiple parties regarding their interest in acquiring certain of ATP's remaining assets within the context of a chapter 11 plan. Those parties are currently undertaking their due diligence. Once they have completed that process, ATP will be in a position to evaluate and select the highest and best offer. Thereafter, ATP will need time to discuss plan concepts with certain of the major constituencies involved in the case to ensure both buy-in and plan feasibility. ATP estimates that this process will take approximately forty five (45) days (the “**Negotiation Period**”) given the upcoming holidays.

4. Assuming the Court approves ATP's proposed timeline, a status conference will be held immediately following the Negotiation Period (*i.e.*, December 12, 2013) at which time ATP will provide the Court with an update as to the status of its chapter 11 plan efforts. Moreover, ATP will advise the Court as to whether a disclosure statement and chapter 11 plan will be filed prior to the Filing Deadline. Given the amount of work to be accomplished, ATP believes the proposed timeline is reasonable especially in light of the rapidly approaching holiday season.

DATED this 30th day of October 2013.

Respectfully submitted,

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ Randall A. Rios

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ATTORNEYS TO THE DEBTOR AND  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of *ATP Oil & Gas Corporation's Status Report with Respect to the Proposed Schedule for the Filing of Disclosure Statement and Chapter 11 Plan* was served electronically via the Court's ECF electronic notification system on October 30, 2013, on all parties registered to receive such notice in this case as of that date.

/s/ Joshua M. Grenard

Joshua M. Grenard